

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: VEANER COPELAND  
DEBTOR**

**CASE NO: 10-14913  
CHAPTER 13**

**MOTION FOR MODIFICATION OF PLAN**

**COMES NOW** the Debtor and files this proposed Modification of her Chapter 13 Plan as follows:

The Debtor filed this Chapter 13 on October 8, 2010. She proposed a sixty (60) month plan. The Debtor can no longer afford to keep her home located at 118 Rhonda Street, Verona, MS 38879. The Debtor respectfully requests to surrender her home to Rushmore Management Services, and if any deficiency amount remains that it be treated as unsecured. The Debtors mortgage loan was originally listed with CitiMortgage. The claim was transferred to Normandy Mortgage Loan Trust c/o Carrington Mortgage Services, and then to Rushmore Management Services. The Debtor also respectfully requests that any mortgage arrears being paid in her plan be removed, and her wage order be amended accordingly. The Debtor will use the extra income toward more affordable housing.

**WHEREFORE**, the Debtor prays that the Chapter 13 Plan be modified as set forth above.

**RESPECTFULLY** submitted, this the 21<sup>st</sup> day of May, 2015.

/s/ R. Gawyn Mitchell  
R. GAWYN MITCHELL, 3383  
Attorney for Debtor

MITCHELL & CUNNINGHAM  
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**IN RE: VEANER COPELAND  
DEBTOR**

**CASE NO: 10-14913  
CHAPTER 13**

**NOTICE OF MOTION FOR MODIFICATION OF PLAN**

YOU ARE HEREBY NOTIFIED that a written response to the attached Motion for Modification of Plan, must be filed with:

David J. Puddister, Clerk of Court  
Cochran U.S. Bankruptcy Court  
Northern District of Mississippi  
703 Highway 145 North  
Aberdeen, MS 39703-0867

and a copy must be served on the undersigned Debtor's attorney, the Chapter 13 Trustee, U.S. Trustee, and all affected creditors on or before twenty-one (21) days from the date of this notice. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon. If no written response is timely filed, the motion may be granted by the Court.

DATED: May 21, 2015

CHAPTER 13 STANDING TRUSTEE

Terre M. Vardaman  
Post Office Box 1326  
Brandon, MS 39043

/s/ R. Gawyn Mitchell  
ATTORNEY FOR DEBTOR  
112 N Broadway  
Post Office Box 7177  
Tupelo, MS 38802-7177  
Telephone No: (662) 407-0408

**CERTIFICATE OF SERVICE**

I, R. Gawyn Mitchell, attorney for the Debtor, do hereby certify that I have this day either mailed, a true and correct copy by United States mail, postage prepaid or electronically mailed through the ECF system, the above and foregoing Motion for Modification of Plan and Notice of Motion for Modification of Plan to the Chapter 13 Trustee, U.S. Trustee, and all affected creditors.

Terre Vardaman  
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United States Trustee  
[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Rushmore Loan Management Services  
P.O. Box 52708  
Irvine, California 92619-2708

DATED: May 21, 2015

*/s/R. Gawyn Mitchell*  
R. Gawyn Mitchell, 3383  
Attorney at Law

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